

KELLER BENVENUTTI KIM LLP  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
David A. Taylor (#247433)  
(dtaylor@kbbkllp.com)  
Dara L. Silveira (#274923)  
(dsilveira@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO ONE HUNDRED  
NINETEENTH OMNIBUS OBJECTION TO  
CLAIMS AND REQUEST FOR ORDER BY  
DEFAULT AS TO UNOPPOSED  
OBJECTION**

**[Re: Dkt. No. 13238]**

**Regarding Objections Set for Hearing  
December 20, 2022, at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule  
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District  
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*  
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**  
8 **Management Order**”), that the Court enter an order by default on the *Reorganized Debtors’ One*  
9 *Hundred Nineteenth Omnibus Objection to Claims (No Liability Claims)* [Docket No. 13238] (the  
10 “**Omnibus Objection**”):

11 **RELIEF REQUESTED IN THE OMNIBUS OBJECTION**

12 The Omnibus Objection seeks to disallow and expunge the Proofs of Claim listed in Exhibit 1  
13 to the Omnibus Objection.

14 **NOTICE AND SERVICE**

15 The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection  
16 [Docket No. 13240]. The Omnibus Objection was also supported by the declaration of A. Anna  
17 Capelle [Docket No. 13239]. The Omnibus Objection, the Notice of Hearing, and the Declaration  
18 were served as described in the *Certificate of Service of Alain B. Francoeur*, filed on November 16,  
19 2022 [Docket No. 13258]: each holder of a claim listed on Exhibit 1 to the Omnibus Objection  
20 received a notice customized to include the claim number, debtor, claim amount and priority, and the  
21 basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and  
22 expunged.

23 The deadline to file responses or oppositions to the Omnibus Objection has passed. The  
24 Reorganized Debtors have received the following response:

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Docket No.	Claimant	Claim No.	Resolution
13297	Gabriel Froymovich	7955	The Reorganized Debtors have reached a settlement of this Claim that resolves the Omnibus Objection.

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1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.

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**KELLER BENVENUTTI KIM LLP**

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Exhibit 1

Original Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Seymour, Jessica 2718 N Bowdish Rd, Apt 343 Spokane Valley, WA 99206		92045	PG&E Corporation and Pacific Gas and Electric Company	12/29/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Claims
Claims To Be Expunged Totals		Count: 1			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	